

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**FREDKIEY HURLEY**, individually,

**Case No. 1:15-CV-03985-AJN**

**Plaintiff,**

**v.**

**LA LUCHA LLC d/b/a LA LUCHA**,  
a New York for profit limited liability  
company and **215 AVENUE B**  
**REALTY LLC** a New York for profit  
limited liability company,

**Defendants.**

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**STATUS REPORT REGARDING SERVICE OF PROCESS**

Plaintiff. FREDKIEY HURLEY, by and through the undersigned counsel and pursuant to this Court's Orders [D.E. 4 & 5], hereby provide the following status report concerning the above styled matter:

1. Having investigated the matter, Plaintiff has learned that both Defendants were properly served in June, 2015. *See* D.E. 6.
2. Plaintiff has requested his investigative expert provide the inspection report for the Property detailing the ADA structural violations in preparation for an Order to show cause in accordance with this Court's individual rules of Practice.

3. Plaintiff is providing this Court with a status report in accordance with this Court's Orders and Plaintiff is seeking an additional thirty (30) days to prepare a formal Order to show cause.

WHEREFORE, Plaintiff respectfully requests that this Court grant Plaintiff thirty (30) days to prepare the motion for default judgment and order to show cause.

Respectfully submitted on November 2, 2015.

**By: /s/ Tara Demetriades**  
Tara Demetriades, Esq.  
New York Bar No. 4185666

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served via the Court's CM/ECF filing system upon all parties of record on November 2, 2015.

**By: /s/ Tara Demetriades**  
Tara Demetriades, Esq.